

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN G. PEDICINI,  
Plaintiff

v.

UNITED STATES OF AMERICA,  
et al.,  
Defendants.

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Case No. 04-12395

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

**PROPOSED SCHEDULING CONFERENCE AGENDA**

The parties in this action submit the following Proposed Settlement Conference Agenda pursuant to Local Rule 16.1 and the Court's Order.

1. **Discussion of Plaintiff's Settlement Proposal:**

a. In accordance with the Court Order, Plaintiff provided Defendants with a proposal for Settlement on February 17, 2005.

2. **Discussion of Discovery Process and Any Issues**

a. Discussion of how discovery may be made more efficient through stipulations.

3. **Discussion of Planned Complaint Amendments**

a. Planned Addition of Count of Retaliation based on First Amendment.

4. Discuss Next Meeting with Judge Regarding Settlement

- a. Discussion of when it might next be beneficial to meet with the Judge regarding possible Settlement.

5. Discussion of Discovery Issues


- a. Production of Documents covered under the Privacy Act. Consider producing under protective order.

Respectfully submitted,

PLAINTIFF,

By his Attorneys,

THE CATAPANO-FRIEDMAN LAW FIRM

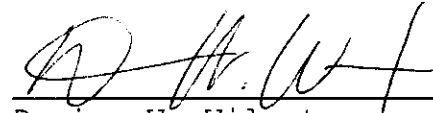
 (signed with permission)

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